IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

PAMELA G. CAPPETTA)	
Plaintiff,)	
V.)	Civil Action
)	No. 3:08cv288
GC SERVICES, LP		
)	
Defendant.)	
)	

PLAINTIFF'S MOTION TO COMPEL INITIAL DISCLOSURES AND TO AMEND THE SCHEDULING ORDER

COMES NOW the Plaintiff, and moves that the Court order the production of initial disclosures pursuant to Rule 26(a)(1), and that it amend the present Scheduling Order following its ruling on the outstanding Motion to Amend, for the reasons set forth in the memorandum of law filed contemporaneously herewith.

Respectfully submitted, **PAMELA G. CAPPETTA**,

Dated: September 2, 2008 Matthew J. Erausquin, VSB#65434

Matthew J. Erausquin, VSB#65434 Leonard A. Bennett, VSB#37523 Counsel for the Plaintiff CONSUMER LITIGATION ASSOCIATES, P.C. 3615-H Chain Bridge Road Fairfax, VA 22030

Tel: 703-273-7770 Fax: 888-892-3512 matt@clalegal.com

CERTIFICATE OF SERVICE

I hereby certify that on the 2^{nd} day of September, 2008 I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification to the following:

Rebecca H. Royals Butler Williams & Skilling PC 100 Shockoe Slip 4th Floor Richmond, VA 23219 rroyals@butlerwilliams.com

James Curie Skilling
Butler Williams & Skilling PC
100 Shockoe Slip
4th Floor
Richmond, VA 23219
jskilling@butlerwilliams.com

/S

Matthew J. Erausquin, VSB#65434 Leonard A. Bennett, VSB#37523 Counsel for the Plaintiff CONSUMER LITIGATION ASSOCIATES, P.C. 3615-H Chain Bridge Road Fairfax, VA 22030

Tel: 703-273-7770 Fax: 888-892-3512 matt@clalegal.com